

ASHBY & GEDDES

ATTORNEYS AND COUNSELLORS AT LAW
500 DELAWARE AVENUE
P. O. BOX 1150
WILMINGTON, DELAWARE 19899

TELEPHONE
302-654-1888
FACSIMILE
302-654-2067

March 14, 2022

The Honorable Christopher J. Burke
United States District Court
844 N. King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: Bear Box LLC, et al. v. Lancium LLC, et al.,
C.A. No. 21-534-MN

Dear Judge Burke:

The parties in the above-referenced matter respectfully request the scheduling of a discovery dispute teleconference.

The disputes at issue have been the subject of verbal and written communications between the parties on multiple occasions, including a telephonic meet-and-confer on February 28, 2022. The following counsel, including at least one Delaware counsel and at least one Lead counsel per party, participated in the February 28, 2022 teleconference:

Delaware Counsel:

Andrew Mayo of ASHBY & GEDDES for Plaintiffs
Chad Stover of BARNES & THORNBURG for Defendants

Lead Counsel:

Benjamin Horton of MARSHALL, GERSTEIN & BORUN for Plaintiffs
Mark Nelson of BARNES & THORNBURG for Defendants

The disputes requiring judicial attention involve:

- 1) Defendants' refusal to produce valuation, transactional, and financial documents related to valuations, transactions, investments, diligence, and current and expected revenue, costs, and profits for datacenter facilities in Abilene, TX and Fort Stockton, TX.

The Honorable Christopher J. Burke
March 14, 2022
Page 2

Additionally, the parties note that defendants have filed a motion to strike and the parties filed a request for a hearing in connection with that motion (D.I. 115). Plaintiffs would like both the motion to strike and motion to compel heard at the same time. Defendants believe the issues in the two motions are separate and could be heard separately, at the Court's discretion.

Respectfully,

/s/ Andrew C. Mayo

Andrew C. Mayo (#5207)

cc: All counsel of record (via electronic mail)